REMARKS

In the Office Action, dated January 25, 2006, claims 1-20 are pending in the application, and these same claims have been rejected. Specifically, claims 1-2, 6, 8-15, and 17-20 are rejected as anticipated under 35 U.S.C. § 102(e) by U.S. Patent No. 6,178,503 (Madden et al.), or in the alternative, rejected as obvious under 35 U.S.C. § 103(a) by Madden et al. in view of "Multiple Bootable Operating System" ("MBOS"), IBM, June 1, 1992, pp. 1-4. Claims 3-5 and 16 are rejected under § 103(a) as obvious in view of Madden et al., MBOS, and further in view of U.S. Patent No. 5,367,628 (Ote et al.). Finally, claim 7 is rejected under § 103(a) as obvious in view of Madden, MBOS, and further in view of U.S. Patent No. 5,850,471 (Brett).

As a preliminary matter, the Applicants respectfully ask that the Examiner acknowledge the IDS filed on March 6, 2006.

Claim Rejections Under 35 U.S.C. §§ 102(e) and 103(a)

Claims 1, 8, 11, and 12 are the independent claims. Claim 1, for example, recites the following subject matter:

> A single computer system for running one or more software applications, wherein the software applications are suitable for generating a video output, said single computer system comprising:
>
> a host operating system suitable for displaying a graphical user interface;
>
> multiple emulated operating systems being emulated by one or more emulator programs running on the host operating system, *wherein at least two of the multiple operating systems are being simultaneously emulated*; and
>
> wherein the host operating system is able to display for a user a reduced-size representation of the video output of the emulated operating systems that are being operated in a background mode.

(emphasis added). In relevant part, claim 1 recites that "at least two of the multiple operating systems are being simultaneously emulated."

In contrast, Madden et al. specifically states that "[b]oot management includes organizing operating systems and allowing users to select which operating **system** to boot" (note the use of the singular "system" and not the plural "systems") (col. 3. ll. 40-41) (emphasis added). Users can choose **one** system from a plurality of systems – but the plurality of systems cannot run simultaneously. Put another way, "[b]ecause there are more operating systems than the computer can boot and run **at one time**, a user **must** select

between operating systems at boot-time" (col. 3. ll. 45-47) (emphasis added). Thus, in short, Madden et al. fails to teach "at least two of the multiple operating systems are being simultaneously emulated" (claim 1).

Next, the MBOS reference also falls short. Here's the relevant aspect highlighted by the Examiner:

> *Although* virtual machines (VM) OSs permit simultaneous emulation of different OS variations, *serial* execution of different OSs is not supported. The [serial] concept described herein provides the ability for multiple OSs and versions to be run on a single machine.

(emphasis added). Thus, MBOS discloses the scenario where users can easily switch between different OSs, but in the context of *serial* (not *simultaneous*) execution.

In the Office Action, the Examiner relies on Madden et al. as the root reference. Madden clearly does not disclose the aforementioned limitation. However, even if, for argument's sake, MBOS did disclose it (which it clearly does not), MBOS could not be combined with Madden et al. The Examiner submits that the motivation to combine lies in "the advantage of synergy between different OSs (Office Action, p. 3). However, because Madden et al. discloses a system that only allows execution of one OS at a time, it could not be then combined with MBOS which (purportedly) would allow simultaneous execution. There are numerous reasons for this: Madden et al. teaches away from simultaneous execution, combining a simultaneous execution system with Madden et al. would destroy the intended functionality of the combination, and so on. In short, Madden et al. and MBOS are simply not combinable – hence the lack of motivation to combine the two.

The other independent claims, 8, 11, and 12 recite similar limitations. Insofar as dependent claims 2-7, 9-10, and 13-20, directly or indirectly depend from claims 1, 8, 11, and 12, respectively, they are also believed to be allowable for the same reasons. Withdrawal of the rejection under §§ 102(e) and 103(a) is therefore earnestly solicited.

CONCLUSION

Applicants believe that the present Amendment is responsive to each of the points raised by the Examiner in the Official action, and submits that Claims 1-20 of the application are in condition for allowance. Favorable consideration and passage to issue of the application at the Examiner's earliest convenience is earnestly solicited.

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